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[Additional counsel on signature page]

Attorneys for Plaintiff
ELECTRIC SOLIDUS, INC. d/b/a SWAN BITCOIN

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

ELECTRIC SOLIDUS, INC. d/b/a
SWAN BITCOIN, a Delaware
corporation,

Plaintiff

v.

PROTON MANAGEMENT LTD., a
British Virgin Islands corporation;
THOMAS PATRICK FURLONG;
ILIOS CORP., a California corporation;
MICHAEL ALEXANDER HOLMES;
RAFAEL DIAS MONTELEONE;
SANTHIRAN NAIDOO; ENRIQUE
ROMUALDEZ; and LUCAS
VASCONCELOS,

Defendants.

Case No. 2:24-cv-8280-MWC-E

**SWAN'S *EX PARTE*
APPLICATION FOR A
TEMPORARY RESTRAINING
ORDER**

Judge: Hon. Michelle Williams Court

Complaint Filed: Sept. 25, 2024
Am. Compl. Filed: Jan. 27, 2025
Trial Date: May 4, 2026

1 **PLEASE TAKE NOTICE** that, pursuant to Local Rule 7-19 and this Court’s
2 standing orders, Electric Solidus, Inc. d/b/a Swan Bitcoin (“Plaintiff” or “Swan”)
3 hereby applies *ex parte* for an order from the Court briefly lifting the discretionary
4 stay as to Defendant Proton Management Ltd. (“Proton”) and temporarily freezing
5 its assets, in addition to scheduling a preliminary injunction hearing and ordering
6 expedited discovery in connection therewith.

7 This Application is based on the Memorandum of Points and Authorities filed
8 concurrently herewith, Declaration of Stacylyn M. Doore, all other pleadings and
9 papers in the Court’s file, and such other argument as may be presented to the Court.
10 Pursuant to Local Rule 7-19, the names, addresses, telephone numbers, and email
11 addresses of counsel for Defendants are as follows:

- 12 • Matthew P. Kanny, mkanny@goodwinlaw.com, Goodwin Procter LLP, 520
13 Broadway, Suite 500, Santa Monica, CA 90401, telephone: (424) 436-3001.
- 14 • Adam C. Trigg, atrigg@be-law.com, Bergeson, LLP, 111 N. Market Street,
15 Suite 600, San Jose, CA 95113, telephone: (408) 291-6200

16 Pursuant to Local Rule 7-19.1 and the Court’s standing order regarding *ex*
17 *parte* applications, counsel for Plaintiff, Stacylyn M. Doore, notified counsel for
18 Defendants, Matthew Kanny, Grant Fondo, Jaideep Venkatesan, and Adam Trigg,
19 via telephone and email on June 11, 2025. Ms. Doore specifically spoke with
20 Messrs. Kanny, Fondo, Venkatesan, and Trigg over the telephone regarding the
21 substance and timing of this Application. *See* Declaration of Stacylyn M. Doore ¶
22 2. Ms. Doore indicated that Plaintiff would be filing this *ex parte* application on
23 June 11, 2025, and that any opposition must be filed no later than 24 hours after
24 service of these papers. *Id.* Counsel for Defendants confirmed that they would
25 oppose the application. *Id.*

1 DATED: June 11, 2025 QUINN EMANUEL URQUHART &
2 SULLIVAN, LLP

3 By: /s/ Stacylyn M. Doore

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